

SEE PAID
RCPT# 0692
\$40.00

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

ABIMAELO MANSO-DIAZ,

Plaintiff,

NOTICE OF PETITION
Civil No. 05-192E

-vs-

WARDEN JAMES SHERMAN,

Defendant.

**(In the Matter of the
Application of Marc
Shatkin, Esq., to be
Admitted to Practice
as an Attorney)**

PLEASE TAKE NOTICE that a petition will be made for the relief specified herein in connection with the action of ABIMAELO MANSO-DIAZ v. WARDEN JAMES SHERMAN, Civil No. 05-192E, as follows:

PETITION BY:

Plaintiff, ABIMAELO MANSO-DIAZ, by his attorneys, Shatkin, & Shatkin.

**DATE AND PLACE
OF HEARING:**

To be determined by the Court, at the United States District Court for the Western District of Pennsylvania, in the City of Pittsburgh, State of Pennsylvania.

SUPPORTING PAPERS:

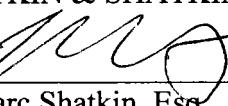
This notice of petition and the accompanying petition of Marc Shatkin, Esq., to appear and participate in this action *pro hac vice* on behalf of plaintiff, ABIMAELO MANSO-DIAZ.

RELIEF DEMANDED:

Order pursuant to Local Rule 83.2.1 of the United States District Court for the Western District of Pennsylvania permitting Marc Shatkin, Esq., to appear in this action *pro hac vice* on behalf of plaintiff, ABIMAELO MANSO-DIAZ.

DATED: BUFFALO, NEW YORK
November 9, 2005

SHATKIN & SHATKIN

By 

Marc Shatkin, Esq.

Attorneys for Plaintiff

434 Delaware Avenue

Buffalo, NY 14202

(716)842-0550

TO: UNITED STATES DISTRICT COURT, W.D.PA.

UNITED STATE ATTORNEY

W.D.PA.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

ABIMAELO MANSO-DIAZ,

Plaintiff,

VERIFIED PETITION
Civil No. 05-192E

-vs-

WARDEN JAMES SHERMAN,

Defendant.

**(In the Matter of the
Application of Marc
Shatkin, Esq., to be
Admitted to Practice
as an Attorney)**

Marc Shatkin, Esq., being duly sworn, deposes and says:

1. This affidavit is submitted in support of the motion pursuant to Local Rules of Practice 83.2.1 of the United States District Court for the Western District of Pennsylvania, for me to be admitted *pro hac vice* before this Court in order to appear on behalf of plaintiff, ABIMAELO MANSO-DIAZ.
2. I reside at 69 Bidwell Parkway, Buffalo, New York 14222, and have an office address for the practice of law at Shatkin & Shatkin, 434 Delaware Avenue, Buffalo, New York, 14202.
3. I received a Bachelor Science, University of Vermont, 1986, Master of Business Administration, University of Pittsburgh 1989 and a Juris Doctor from University of Buffalo 1994. Since graduating law school, I have concentrated my practice in the areas of civil and criminal litigation..
4. I was admitted to practice law in the State of New York and the U.S. District Court, Western District of New York, in 1995.

5. I am fully familiar with the underlying facts in this matter, and have experience in litigation of this type of case.
6. My role in this action would be to handle all aspects of the litigation of this matter, including pretrial and trial proceedings.
7. I have never been held in contempt of court, or censured in a disciplinary proceeding, suspended, or disbarred by any court, or admonished by any disciplinary committee of the organized bar, nor am I the subject of a pending complaint before any court.
8. I have read and am familiar with the provisions of Title 28 of the United States Code that pertain to jurisdiction of and venue in a United States District Court, the Federal Rules of Civil and Criminal Procedure, the Federal Rules of Evidence, the Local Rules of Practice for the United States District Court for the Western District of Pennsylvania, the Code of Professional Responsibility as adopted by the Appellate Division of the State of Pennsylvania and as interpreted and applied by the United States Supreme Court, the United States Court of Appeals for the 3rd Circuit, and this Court.

WHEREFORE, the petitioner respectfully requests to be admitted as an attorney in the United States District Court for the Western District of Pennsylvania.

I verify under penalty of perjury that the foregoing is true and correct.



Marc Shatkin, Esq.

Sworn to before
me this 9th day
of November, 2005.


NOTARY PUBLIC

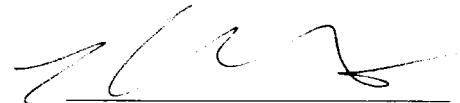
PAUL SHATKIN
NOTARY PUBLIC
QUALIFIED IN ERIE COUNTY
MY COMMISSION EXPIRES FEB. 10, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true and correct and copy of the within NOTICE OF PETITION was served by ordinary mail, by placing the same in a pre-paid envelope under the exclusive care of the United States Post office addressed to:

United States Attorney
Michael C. Colville, Esq
Western District of Pennsylvania
700 Grant Street, Suite 4000
Pittsburgh, Pennsylvania 15219

Dated: November 9, 2005



MARC SHATKIN, ESQ.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

ABIMAEI MANSO-DIAZ

Plaintiff

v.

CIVIL ACTION NO. 05-192E
CERTIFICATE OF SERVICE

JAMES F. SHERMAN, WARDEN
McKEAN FEDERAL CORRECTION INSTITUTION
Defendant

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Michael C. Colville, Esq
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Dated: November 9, 2005



MARC SHATKIN, ESQ.
SHATKIN & SHATKIN
Attorneys for plaintiff
434 Delaware Avenue
Buffalo, New York 14202
716-842-0550